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22 SAFEWAY INC. and SAFEWAY BENEFIT  
23 PLANS COMMITTEE

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

18 DENNIS M. LORENZ, Individually and On  
19 Behalf of All Others Similarly Situated,

20 Plaintiff,

21 vs.

22 SAFEWAY, INC.; SAFEWAY BENEFIT  
23 PLANS COMMITTEE; GREAT-WEST  
24 FINANCIAL RPS LLC; and DOES 1 through  
25 50, inclusive,

26 Defendants.

27 Case No. 3:16-cv-04903-JST

28 **STIPULATION FOR AN ORDER  
CONTINUING CASE MANAGEMENT  
CONFERENCE TO OCTOBER 11, 2017**

1 Pursuant to Local Rule 6-1(b), Defendants SAFEWAY INC. and SAFEWAY BENEFIT  
2 PLANS COMMITTEE (collectively, “Safeway Defendants”) and Plaintiff DENNIS M. LORENZ  
3 (“Plaintiff”) (Plaintiff and Safeway Defendants collectively referred to as the “Parties”) hereby  
4 stipulate and request, by and through their respective counsel, an order continuing the further case  
5 management conference that is currently set in this litigation to October 11, 2017 at 2:00 p.m.:

6 WHEREAS, a further case management conference is currently set in this action for  
7 September 13, 2017 at 2:00 p.m., with an updated joint case management statement due by  
8 September 5, 2017 (Docket No. 61);

9 WHEREAS, this case was deemed “related” to another case currently pending before the  
10 Court, titled *Maria Karla Terraza v. Safeway Inc., et al.* (No. 16-cv-03994-JST) (Docket No. 26);

11 WHEREAS, a further case management conference was previously set in the *Maria Karla*  
12 *Terraza* action for September 13, 2017 (Case No. 16-cv-03994 Docket No. 66);

13 WHEREAS, on August 25, 2017, the Clerk issued a notice continuing the case management  
14 conference in the *Maria Karla Terraza* case to October 11, 2017 at 2:00 p.m., with an updated joint  
15 case management statement due by October 2, 2017 (Case No. 16-cv-03994 Docket No. 91);

16 WHEREAS, the Parties have agreed that good cause exists for an order continuing the  
17 further case management conference currently set in this case, to the October 11, 2017 at 2:00 p.m.  
18 continued date set in the *Terraza* action because issues may be addressed at both conferences that  
19 affect both of these related cases, and that an updated joint case management statement will be due  
20 in this action by October 2, 2017 accordingly;

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1 NOW, THEREFORE, the Parties hereby stipulate and request as follows:

2 1. That the Court issue an order continuing the further case management conference  
3 currently set in this action to the October 11, 2017 at 2:00 p.m., and that an updated  
4 joint case management statement will be due by October 2, 2017.

5  
6 IT IS SO STIPULATED.

7  
8 DATED: August 30, 2017

TRUCKER ♦ HUSS

9 By: /s/ Joseph C. Faucher  
10 R. Bradford Huss  
11 Joseph C. Faucher  
12 Attorneys for Defendants  
13 SAFEWAY INC. and SAFEWAY BENEFIT  
14 PLANS COMMITTEE

15 DATED: August 30, 2017

16 SCHNEIDER, WALLACE, COTTRELL, KONECKY,  
17 WOTKYNS, LLP

18 By: /s/ Kyle G. Bates  
19 Jason H. Kim  
20 Kyle G. Bates  
21 Attorneys for Plaintiff  
22 DENNIS M. LORENZ, individually and on behalf  
23 of the SAFEWAY 401(K) PLAN

24 I attest that my firm has obtained Kyle G. Bates's concurrence in the filing of this document.

25 DATED: August 30, 2017

26 TRUCKER ♦ HUSS

27 By: /s/ Joseph C. Faucher  
28 R. Bradford Huss  
Joseph C. Faucher  
Attorneys for Defendants  
SAFEWAY INC. and BENEFIT PLANS  
COMMITTEE SAFEWAY INC.

## **PROPOSED ORDER**

Good cause exists for an order continuing the further case management conference currently set in this action for September 13, 2017. The further case management conference is hereby continued to October 11, 2017 at 2:00 p.m. An updated joint case management statement is due by October 2, 2017.

DATE: August 30, 2017

  
Hon. Jon S. Tigar  
United States District Court Judge

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